

Strategic Environmental Assessment (SEA) for the Wells-next-the-Sea Neighbourhood Plan

Environmental Report

June 2023

Quality information

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Non-Technical Summary (NTS)

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Wells-next-the-Sea Neighbourhood Plan (WNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the WNP is a legal requirement.¹ This is a Non-Technical Summary (NTS) of the SEA Environmental Report.

The WNP is being prepared in the context of the local planning framework for North Norfolk District Council (NNDC). Once 'made' the WNP will have material weight when deciding on planning applications, alongside the Local Plan.

The WNP SEA Environmental Report (and this NTS) is being published alongside the 'submission' version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).

Structure of the Environmental Report/ this NTS

SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). In creating a structured approach, SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
 - i.e., in relation to exploring and appraising 'reasonable alternatives' (as prescribed by the SEA Regulations²).
2. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan that is being consulted on.
3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report (Part 1, Part 2, and Part 3) and summarised within this NTS. However, the scene is first set by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

¹ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or b) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The WNP was subject to screening in 2023 (undertaken by North Norfolk District Council) which determined SEA is required.

² The SEA Regulations are not prescriptive as to what constitutes reasonable alternatives but identifies that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes, and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*" considering the plan objectives and geographical scope.

What is the Plan seeking to achieve?

The WNP has identified the following vision:

“Wells-next-the-Sea will continue to be a small, thriving, and attractive coastal town, with a working port and a vibrant and balanced community. It will have a range of housing types and tenures to suit all ages and incomes, supported by appropriate infrastructure and employment opportunities. Development will be sympathetic to local character, well designed, suitably located, and sensitive to the environment. Local heritage and the Area of Outstanding Natural Beauty will be protected. Wells will be a desirable place to live, work, and visit for current and future generations.”

To support this vision, five objectives have been identified for the themes of housing and design, employment and retail, infrastructure and access, environment, and sustainability and climate change (see page 4 of the main Environmental Report for a full list of WNP objectives).

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes and objectives, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. The SEA framework for the WNP is provided below. The preferred approach of the plan, alongside reasonable alternatives are appraised in relation to each of the objectives identified through scoping.

SEA theme	SEA objective
Biodiversity	Protect and enhance biodiversity and geodiversity.
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land, protect, and enhance water quality, and use and manage water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

Plan-making/ SEA up to this point (Part 1 of the Environmental Report)

An important element of the required SEA process involves appraising 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the plan proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or alternative sites.

Specifically, Part 1 of the report -

1. Explains the process of establishing the reasonable alternatives.
2. Presents the outcomes of appraising the reasonable alternatives.
3. Explains reasoning behind the preferred option, considering the appraisal of options.

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- WNP objectives, particularly the objective to provide housing for local people in line with identified needs.
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Establishing the reasonable alternatives

The Environmental Report explains how reasonable alternatives were established after the process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

Headline considerations in forming alternatives are summarised below:

- There is no strategic housing growth target for the WNP to meet and the pursuit of additional housing development relates to a core plan objective to deliver affordable housing.
- The preferred plan approach is to allocate a Town Council owned site (Site CFS2) which could deliver a 100% affordable housing scheme (delivering 45 new affordable homes).
- One of the potential sites (Site H01594) being considered is very small, with a potential to deliver 1-2 new homes, and within the existing settlement area. Sustainable development of the site is largely supported through the existing planning policy framework and its potential to contribute to affordable housing needs is minimal. The site is therefore not progressed as a reasonable alternative for the purposes of the SEA.
- Whilst Site H1015 could deliver a small-scale development scheme, no agreement for an affordable housing scheme has been achieved with the

landowner and the contribution would be relatively small. On this basis, the site is also not progressed as a reasonable alternative for the purposes of the SEA.

These considerations reduced a 'short-list' of six sites to four alternative options for the purposes of the SEA. The preferred approach (Option 2) and alternatives to this are identified below and carried forward for further appraisal:

- **Option 1:** Site CFS1 (in part) delivering up to 30 new homes, around 10 of which are likely to be affordable homes.
- **Option 2:** Site CFS2 (in part) delivering 45 new homes, all of which would be affordable homes.
- **Option 3:** Site CFS3 (in part) delivering up to 40 new homes, around 14 of which are likely to be affordable homes.
- **Option 4:** Site H0699 (in part) delivering up to 60 new homes, around 21 of which are likely to be affordable homes.

Appraising the reasonable alternatives

Chapter 6 of the Environmental Report assesses the four options identified above in relation to the SEA themes and objectives established through scoping, examining likely significant effects. Red is used to indicate the potential for significant negative effects and green indicates the potential for significant positive effects. Where appropriate uncertainty will also be noted with grey shading.

Efforts are also made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of significant effects. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. An 'equals' sign ("=") indicates options are ranked on par with each other and occurs when no significant/ meaningful differences can be drawn between options. In addition, if two options are considered to rank joint first, this would be indicated by "1", and the next option would then be ranked third (3) accordingly.

The following summary findings are reached in the appraisal of the options and supporting text can be found within the main report:

SEA theme	Summary findings	Option 1	Option 2	Option 3	Option 4
Biodiversity	Significant effect?	No	No	Uncertain	No
	Rank	2	1	4	2
Climate change and flood risk	Significant effect?	No	No	No	No
	Rank	1	3	1	3
Community wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	1	3	2
Historic environment	Significant effect?	No	Uncertain	No	Uncertain

SEA theme	Summary findings	Option 1	Option 2	Option 3	Option 4
	Rank	1	2	2	2
Land, soil, and water resource	Significant effect?	No	No	No	No
	Rank	3	1	1	3
Landscape	Significant effect?	No	No	No	No
	Rank	2	2	4	1
Transportation and movement	Significant effect?	No	No	Uncertain	No
	Rank	1	1	3	3

Developing the preferred approach

The WNP Working Party provide the following reasoning for continuing with the preferred approach (Option 2) as identified below:

“Taking into account findings of evidence provided by independent studies, including the Site Options Assessment, the Housing Needs Assessment and the feedback from the community at Policy Ideas and Pre-Submission consultation stages, the Neighbourhood Plan proposes to identify an area of land for a specific Community Led Housing Development which would provide affordable housing for local people.

The preferred site to provide this form of housing is a portion of Site CFS2. The reasons for the preferred site are:

- *The site is well related to the current settlement pattern of the town. The site is not subject to nature conservation designations.*
- *The site can be developed to provide good pedestrian and cycle links with the rest of the town and the town centre.*
- *The site would allow for 100 per cent affordable housing, as it is in public ownership and therefore more likely to be a viable site for this form of development.*
- *The position of the site in the south-eastern corner of the wider triangle site allows for a design and layout that would provide better assimilation into the wider landscape.*
- *The majority of the wider site will remain open and in current use as allotment and horse paddock.*
- *Homes for Wells (a Community Land Trust) have indicated an interest in engaging with the Town Council in the development of affordable housing on the site.*
- *Development on this site would be in the form of a Community Led Housing development aimed at providing affordable housing for those people with a local connection to Wells.”*

EA findings at this stage (Part 2 of the Environmental Report)

Part 2 of the Environmental Report presents an assessment of the 'Submission' version of the WNP. Assessment findings are presented as a series of narratives under the 'SEA framework' theme headings and consideration is given to cumulative effects. The following conclusions are reached:

Overall, despite the significant constraints associated with the neighbourhood area, no significant negative effects are considered likely in implementation of the WNP. Minor negative effects are concluded as likely in relation to the landscape, and land, soil, and water resources SEA themes, predominantly given the loss of greenfield land at the settlement edge. As no major development is being proposed in the AONB and policy mitigation is provided, significant landscape impacts are considered likely to be avoided.

This is contrasted with predicted likely significant positive effects in relation to both the community wellbeing and transportation and movement SEA themes. This reflects the core plan efforts to deliver a 100% affordable housing scheme and rebalance the housing stock, with greater restrictions on second homes and more opportunities for those with local connections, including key workers in the area. Additional efforts to safeguard rail corridors that could enhance the future sustainability performance of the area are noted in relation to transportation and movement.

Minor positive effects are also concluded in relation to the SEA theme of landscape, as well as the themes of climate change and flood risk, and the historic environment. Positive landscape effects are considered likely due to the prioritisation of brownfield redevelopment opportunities (and opportunities to improve the immediate townscape), and the identification of detailed design guidance. The support for high-quality development and identification of relatively accessible development sites within walking distance of the town centre, alongside the safeguarding of potential future rail connections that could significantly improve the settlement's sustainability performance are considered likely to contribute to climate resilience and deliver minor benefits in this respect.

Broadly neutral residual effects are concluded as most likely in relation to biodiversity, reflecting the stringent policy mitigation measures proposed developed with the supporting HRA.

One recommendation is made to update the site allocation policy suggesting that development targets biodiversity net gains on site to the south of the site and the area connecting with the deciduous woodland Priority Habitat there.

Next steps (Part 3 of the Environmental Report)

Part 3 of the Environmental Report explains the next steps that will be taken as part of plan-making and SEA.

Plan submission

Following submission, the plan and this SEA will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the plan will then be subject to a referendum, organised by North Norfolk District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for North Norfolk, covering the defined neighbourhood area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by North Norfolk District Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the WNP that would warrant more stringent monitoring over and above that already undertaken by the Council.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Wells-next-the-Sea Neighbourhood Plan (WNP).
- 1.2 The WNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 and in the context of the local planning framework for North Norfolk District Council (NNDC). Once 'made' the WNP will have material weight when deciding on planning applications, alongside the adopted Local Plan for North Norfolk.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the WNP is a legal requirement.³

SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004. In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".⁴ The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.5 More specifically, the Report must answer the following three questions:
 4. What has plan-making/ SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
 5. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan.
 6. What happens next?
- 1.6 This report is the Environmental Report for the WNP. It is published alongside the 'submission' version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended). This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.⁵ Each question is answered within a discrete 'part' of the report (Part 1, Part 2, and Part 3). However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

³ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or b) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The WNP was subject to screening in 2023 (undertaken by North Norfolk District Council) which determined SEA is required.

⁴ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

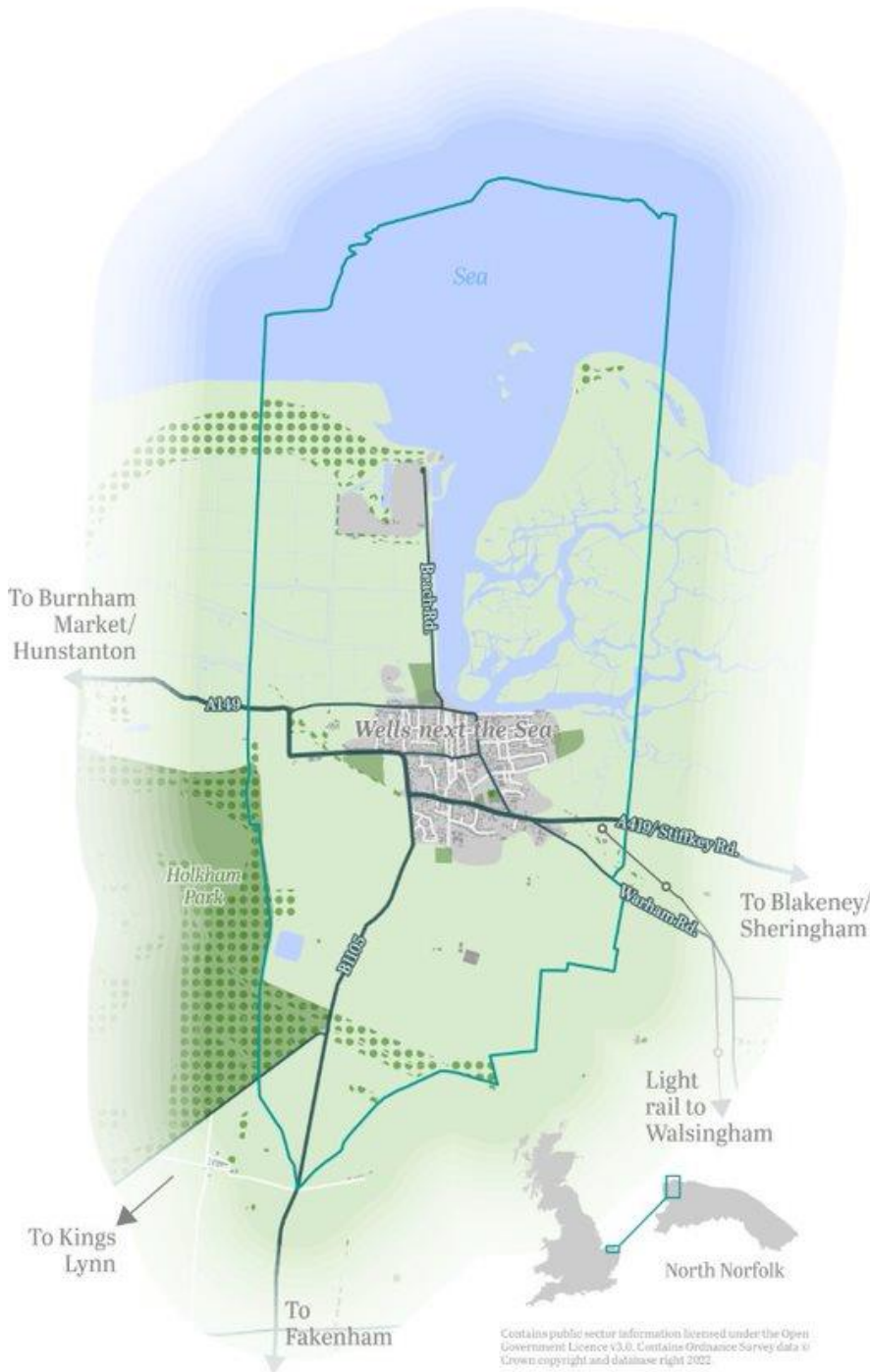
⁵ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Introduction

2.1 This section considers the strategic planning policy context provided by NNDC's local planning framework before presenting the vision and objectives of the WNP. The neighbourhood area is depicted in Figure 2.1 below.

Figure 2.1: Wells-next-the-Sea Neighbourhood Area



Strategic planning policy context

- 2.2 NNDC's local development framework consists of the North Norfolk Core Strategy, adopted in 2008 and the Site Allocations Development Plan Document (DPD) 2011, together with the Council's adopted Mineral and Waste Plan and the Marine Management Organisation (MMO) East Marine Plan.
- 2.3 The adopted Core Strategy (Policy SS1) recognises Wells-next-the-Sea as a secondary settlement in the settlement hierarchy. Secondary settlements together will deliver approximately 25% of employment land allocations and 20% of the new homes required over the plan period. Policy SS3 identifies a housing requirement for Wells-next-the-Sea of between 100 and 150 new homes (on top of existing commitments at that time) in the period up to 2021.
- 2.4 The Site Allocations DPD made a single land allocation at the 'Land at Market Lane' (W01) in Wells-next-the-Sea for 120 new homes and this site has since been constructed. The DPD further identifies that the land immediately south of this site could come forward as an affordable housing exception site though this has not been developed to date.
- 2.5 NNDC are in the process of developing a new Local Plan which plans for the period up to 2036. This Plan has been submitted for examination and if adopted, will replace the Core Strategy and Site Allocations DPD.
- 2.6 The new Local Plan identifies Wells-next-the-Sea as one of five small growth towns (alongside Holt, Hoveton, Sheringham, and Stalham) where "a lesser quantity of development will be located" (Policy SS1). Policy HOU 1 demonstrates this equates to 16.2% of the total growth anticipated over the plan period (with 51.3% of new development expected at the large growth towns). Within Wells-next-the-Sea, 126 dwellings are already committed (as either recently completed development or sites with planning permission) and 70 new homes are expected on sites allocated within the Plan, thus equating to a total of 196 new homes in the period up to 2036. Two sites are allocated in the Plan which combined will deliver the 70 new homes at the 'Land south of Ashburton Close' (20 homes) and the 'Land adjacent Holkham Road' (50 homes). 25 of the 70 new homes are expected to be affordable homes and new areas of public open space are also expected.

Neighbourhood Plan vision and objectives

- 2.7 The WNP has established the following vision:

"Wells-next-the-Sea will continue to be a small, thriving, and attractive coastal town, with a working port and a vibrant and balanced community. It will have a range of housing types and tenures to suit all ages and incomes, supported by appropriate infrastructure and employment opportunities. Development will be sympathetic to local character, well designed, suitably located, and sensitive to the environment. Local heritage and the Area of Outstanding Natural Beauty will be protected. Wells will be a desirable place to live, work, and visit for current and future generations."

2.9 To support this vision, the following five objectives have been identified:

Housing and design - Objective 1: To provide housing for local people and seek to meet the existing and future needs of those who live and work in the town, for the elderly and those wishing to move to the area, to retain a balance between young and old, and working and retired.

Employment and retail - Objective 2: To encourage the creation of a range of employment opportunities in the town to maintain a strong, responsive economy, consistent with the character of the town.

Infrastructure and access - Objective 3: To ensure that the provision of local services (domestic, health, education, transport, and leisure) meets the needs of all sections of the community and visitors.

Environment - Objective 4: To protect and enhance the character of the area as a living and working town and visitor destination, set in an Area of Outstanding Natural Beauty and wildlife sensitivity.

Sustainability and climate change - Objective 5: To ensure that all planning decisions address the effects of climate change, including rising sea levels and to require the use of environmentally sustainable materials in new developments.

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information, i.e., the key issues which supported the development of the objectives, is presented in Appendix B.

Consultation

- 3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁶ As such, these authorities were consulted in February 2023. Responses were received from Natural England and Historic England, the details of which are provided in Appendix B. No response was received from the Environment Agency.

The SEA framework

- 3.3 The SEA scope is summarised in a list of themes and objectives, known as the SEA framework. Table 3.1 presents the SEA framework.

Table 3.1: SEA framework

SEA theme	SEA objective
Biodiversity	Protect and enhance biodiversity and geodiversity.
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land, protect, and enhance water quality, and use and manage water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

⁶ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 Whilst work on the WNP has been underway for some time, the aim here is not to provide a comprehensive explanation of all the work carried out to date, but rather to explain work undertaken to development and appraise reasonable alternatives to the preferred plan approach.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites.

Why focus on housing land?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
- WNP objectives, particularly the objective to provide housing for local people in line with identified needs.
 - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
 - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Structure of this part of the report

- 4.4 This part of the report is structured as follows:
- **Chapter 5** - explains the process of establishing reasonable alternatives.
 - **Chapter 6** - presents the outcomes of appraising reasonable alternatives; and
 - **Chapter 7** - explains reasons for selecting the preferred option, considering the appraisal.

5. Establishing reasonable alternatives

Introduction

- 5.1 The aim here is to explain the process that led to the establishment of alternative sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.⁷
- 5.2 Specifically, there is a need to explore the context for the OWNP and explain the parameters that have a bearing on the establishment of options, as well as the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the OWNP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

Strategic parameters

- 5.3 As noted in Chapter 2, the strategic context is set by both the adopted and emerging North Norfolk Local Plans. For the purposes of alternatives, focus is paid to the emerging plan which matches the proposed plan period for the WNP.
- 5.4 The emerging Local Plan identifies that Wells-next-the-Sea, 126 dwellings are already committed (as either recently completed development or sites with planning permission) and 70 new homes are expected on sites allocated within the Plan, thus equating to a total of 196 new homes in the period up to 2036. This is deemed to be the strategic housing requirement met for the area, and there is no need for the WNP to identify additional housing allocation sites.
- 5.5 However, the WNP, informed by a Housing Needs Assessment (HNA) for Wells, Walsingham, Warham, and Wighton, seeks to address a key issue for the Wells area, that being access to affordable housing, and there is an intention to explore sites that could deliver against affordable housing needs.

Site options

- 5.6 The Site Options Assessment (SOA) Report supporting the WNP has investigated all known sites emerging from a local call for sites and from the wider evidence base supporting the emerging Local Plan. The SOA Report has identified and investigated a total of eleven sites and found only five to be potentially suitable for allocation in the neighbourhood plan, with the remaining six sites found not suitable for allocation and no sites found free from constraints.
- 5.7 Of note at this point, one of the sites (Site CSF2) deemed not suitable through the SOA was dismissed due to legal covenants on the site and its designation in the emerging Local Plan as an ‘open land area’. The WNP Working Party have identified through further considerations, that these constraints could likely be overcome in the pursuit of a relatively small-scale 100% affordable housing scheme on the site, which is made possible by the fact that the Town Council is the landowner of the site.

⁷ Schedule 2(8) of the SEA Regulations

5.8 The sites found in the SOA Report to be potentially suitable for allocation are discussed in turn below:

- Site CFS1: The report indicates that there are constraints relating to highways, landscape, and drainage which would need to be overcome for the site to progress as a development site. The larger site submission would need to be reduced in scale to avoid major development in the AONB but a small portion of the site in the west, adjacent to the Local Plan allocation site could be considered for the development of up to 30 new homes.
- Site CFS3: The report indicates that there are constraints relating to highways, landscape, nature conservation, and drainage which would need to be overcome for the site to progress as a development site. The larger site submission would need to be reduced in scale to avoid major development in the AONB but a smaller settlement edge development of up to 40 new homes could be considered.
- Site H0699: The report indicates that there are constraints relating to the sites proximity to the sewage treatment works and impact on landscape that would need to be overcome for the site to progress as a development site. Again, a smaller portion of the site would need to be considered to avoid major development in the AONB, but a smaller area adjacent to the emerging Local Plan allocation site could deliver up to 60 new homes.
- Site H01594: The site is a small site that could deliver 1-2 new homes within the existing settlement area. The report indicates that there are constraints in relation to landscape, the designated Conservation Area, and Priority Habitat (woodland) onsite.
- Site H1015: The site could be potentially suitable for a small development scheme of up to 5 new homes. This falls below the Local Plan threshold to deliver affordable housing as a proportion of development, so an affordable housing scheme would need to be pursued with the landowner.

Establishing reasonable alternatives

5.9 There are some headline considerations in forming alternatives which are summarised below:

- There is no strategic housing growth target for the WNP to meet and the pursuit of additional housing development relates to a core plan objective to deliver affordable housing.
- The preferred plan approach is to allocate a Town Council owned site (Site CFS2) which could deliver a 100% affordable housing scheme (delivering 45 new affordable homes).
- One of the potential sites (Site H01594) being considered is very small, with a potential to deliver 1-2 new homes, and within the existing settlement area. Sustainable development of the site is largely supported through the existing planning policy framework and its potential to contribute to affordable housing needs is minimal. The site is therefore not progressed as a reasonable alternative for the purposes of the SEA.
- Whilst Site H1015 could deliver a small-scale development scheme, no agreement for an affordable housing scheme has been achieved with the

landowner and the contribution would be relatively small. On this basis, the site is also not progressed as a reasonable alternative for the purposes of the SEA.

5.10 Considering these points, four sites remain in contention (including the preferred site) for allocation in the plan, and these sites form the options for appraisal, see Figure 5.1. Landowners of the alternative sites (Option 1, 3, and 4) are likely to progress open market housing schemes with a percentage of affordable housing delivery in line with the emerging Local Plan requirements. For clarity the four options are:

- **Option 1:** Site CFS1 (in part) delivering up to 30 new homes, around 10 of which are likely to be affordable homes.
- **Option 2:** Site CFS2 (in part) delivering 45 new homes, all of which would be affordable homes.
- **Option 3:** Site CFS3 (in part) delivering up to 40 new homes, around 14 of which are likely to be affordable homes.
- **Option 4:** Site H0699 (in part) delivering up to 60 new homes, around 21 of which are likely to be affordable homes.

Figure 5-1: Reasonable alternatives for the WNP



Wells-next-the-Sea Neighbourhood Plan

- Wells-next-the-Sea
- Site



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6. Appraising reasonable alternatives

6.1 This chapter presents the findings for the appraisal of alternative options. As established in the previous chapter, the following four options are taken forward for appraisal:

- **Option 1:** Site CFS1 (in part) delivering up to 30 new homes, around 10 of which are likely to be affordable homes.
- **Option 2:** Site CFS2 (in part) delivering 45 new homes, all of which would be affordable homes.
- **Option 3:** Site CFS3 (in part) delivering up to 40 new homes, around 14 of which are likely to be affordable homes.
- **Option 4:** Site H0699 (in part) delivering up to 60 new homes, around 21 of which are likely to be affordable homes.

Methodology

6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Red is used to indicate the potential for significant negative effects and green indicates the potential for significant positive effects. Where appropriate uncertainty will also be noted with grey shading.

6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a significant effect, this is made explicit in the appraisal text.

6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. An 'equals' sign ("=") indicates options are ranked on par with each other and occurs when no significant/ meaningful differences can be drawn between options.

6.5 In addition, if two options are considered to rank joint first, this would be indicated by "=1", and the next option would then be ranked third (3) accordingly.

6.6 Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.⁸ So, for example, account is taken of the duration, frequency, and reversibility of effects.

⁸ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 20004.

Summary findings

SEA theme	Summary findings	Option 1	Option 2	Option 3	Option 4
Biodiversity	Significant effect?	No	No	Uncertain	No
	Rank	2	1	4	2
Climate change and flood risk	Significant effect?	No	No	No	No
	Rank	1	3	1	3
Community wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	3	1	3	2
Historic environment	Significant effect?	No	Uncertain	No	Uncertain
	Rank	1	2	2	2
Land, soil, and water resource	Significant effect?	No	No	No	No
	Rank	3	1	1	3
Landscape	Significant effect?	No	No	No	No
	Rank	2	2	4	1
Transportation and movement	Significant effect?	No	No	Uncertain	No
	Rank	1	1	3	3

Biodiversity

- 6.7 None of the options intersect with any of the internationally or nationally designated sites for biodiversity within the neighbourhood area, which are primarily located in the northern part of the neighbourhood area. This includes the North Norfolk Coast Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site and Site of Special Scientific Interest (SSSI), and the Holkham National Nature Reserve (NNR). However, Option 3 is 330m west of Wells Chalk Pit SSSI, which straddles the neighbourhood area's boundary with Warham Parish. All of the options fall within an SSSI Impact Risk Zone (IRZ) for residential development of 10 units or more, and any rural residential development with a total net gain in units. Due to this, Natural England will need to be consulted on the likely risks arising from development.
- 6.8 Whilst none of the options contains areas of Biodiversity Action Plan (BAP) priority habitat, Options 1, 2 and 3 are adjacent to small areas of deciduous woodland. With regards to the National Habitat Network, Options 1, 3 and 4 overlap with a Network Expansion Zone; this is land with potential for expanding and linking networks across the landscape. Option 3 also partially overlaps with Network Enhancement Zone 1; this is land connecting existing patches of primary and associated habitats which is likely to be suitable for creation of the primary habitat.

6.9 In light of the above, Option 2 is ranked first, as it is outside of the National Habitat Network, followed by Options 1 and 4 which are ranked joint second. Option 3 is ranked fourth due to its proximity to the Wells Chalk Pitt SSSI and because it overlaps with a Network Expansion Zone and Network Enhancement Zone 1. However, it is recognised that development will not cover the whole site; rather, it will be focused at the settlement edge, in the northern part of the site, and along the road that runs through the centre of the site. Whilst significant effects are not anticipated under Option 3, **uncertainty** is still noted as development is still likely to occur within Network Enhancement Zone 1.

Climate change and flood risk

6.10 In terms of climate change mitigation, there is limited potential to meaningfully differentiate between the options in relation to reducing contributions to climate change as no site is identified for any significant opportunities to improve the baseline. Whilst options could be ranked regarding their accessibility to Wells-next-the-Sea's range of services and facilities, this is explored under the transportation SEA topic. Moreover, given the rural location of the neighbourhood area, each option is considered likely to lead to a degree of car dependency for accessing services and facilities at higher tier settlements.

6.11 It is also considered that there are negligible differences in terms of the ability to achieve ambitious building emissions standards in support of decarbonisation given that all options are relatively small-scale. However, economies of scale could lead to opportunities to achieve a high building standard, and in this respect, Option 4, which has the potential to deliver up to 60 new dwellings, could perform marginally better than the remaining options. However, given that this is still a relatively small development, delivering under 100 new dwellings, it is unlikely that such opportunities will arise and therefore Option 4 is unlikely to have an edge on the other options in this respect.

6.12 In terms of fluvial flood risk, whilst all of the options are within Flood Zone 1, Option 4 is adjacent to an area of land within Flood Zone 3 to the north. In terms of surface water flood risk, whilst all the options are at a very low risk of flooding, Option 2 is adjacent to an area with a medium-high risk of flooding to the south. In this respect, an increase in non-permeable surfaces, which will likely arise from development under all four options, has the potential to increase surface water flooding. Hence, the incorporation of Sustainable Drainage Systems (SuDS) into the design of developments will be key.

6.13 In light of the above, Options 1 and 3 are ranked joint first, as they have the lowest risk of flooding. However, they are only considered marginally better than Options 2 and 4, which are ranked joint third. Whilst these sites are adjacent to areas at increased risk of flooding, the sites themselves are not at risk. Option 2 is ranked third, due to its proximity to an area with a medium-high risk of flooding; however, this is not considered severe enough to lead to significant effects, as flood risk on the site is very low.

Community wellbeing

6.14 Whilst all options will deliver the identified housing need for the neighbourhood area, Options 2 and 4 perform most favourably. Option 2 delivers the highest number of affordable homes as part of a community led development, whilst

- Option 4 delivers the highest number of homes overall. Option 4 is therefore likely to deliver the greatest variety of housing types and tenures, including houses for first-time buyers, houses for young families, and houses for the elderly that support independent living.
- 6.15 Given economies of scale, it is also considered that Option 4 may lead to greater positive effects by delivering more infrastructure alongside housing development at the site. This could include green infrastructure and greater opportunities for net gains in biodiversity, supporting community wellbeing.
- 6.16 With regards to Local Green Space (LGS), as designated in the draft WNP, all four options are within walking distance of LGS. However, Option 1 covers land designated as LGS (Mill Road Meadow (north of Mill Road)).
- 6.17 All options are considered to perform similarly in terms of their potential to support sustainable access to local services and facilities. This is because growth under all four options would offer a broadly similar potential to walk to the limited range of services and facilities in Wells-next-the-Sea. Nevertheless, Options 2 and 3 are closest to Alderman Peel School, and Option 3 is the closest to Wells-next-the-Sea Primary and Nursery School.
- 6.18 With a focus on the Index of Multiple Deprivation (IMD), Options 1, 2 and 3 all fall within Lower Layer Super Output Area (LSOA) 'North Norfolk 002C', which is amongst the 50% least deprived neighbourhoods in the country in terms of overall IMD. However, Option 4 falls partially within this LSOA, and partially within LSOA 'North Norfolk 002B', which is amongst the 30% most deprived neighbourhoods in the countryside. In this respect, this option provides the opportunity to revitalise a currently deprived area of Wells-next-the-Sea.
- 6.19 Whilst all four options perform relatively on-par, Options 2 is ranked first as it delivers the highest number of affordable homes as part of a community led development, which will allow it to specifically cater for the neighbourhood area's housing needs. Option 4 is ranked second as it has the potential to deliver the greatest variety of housing types and tenures, as well as new infrastructure, including green infrastructure. Meanwhile, Options 1 and 3 are ranked joint third. Overall, all four options are considered likely to lead to **significant positive effects** as they meet the required housing need of the neighbourhood area and are assumed to deliver a proportion of affordable homes.

Historic environment

- 6.20 None of the options contain designated heritage assets; however, Option 2 is 20m north of grade II listed building 'West Cottage', which is located opposite the junction of Two Furlong Hill and Burnt Street. However, it is noted that this building is well screened from the site by a row of trees. Nevertheless, Option 2 is also 160m south of a cluster of four grade II listed buildings located on the junction of Mill Road, Park Road and Two Furlong Hill. As there is open land between the site and this cluster of buildings, development at this location is likely to impact their setting to some degree.
- 6.21 Option 3, whilst the largest in size and only 90m southeast of Wells Conservation Area, is well screened from the conservation area by an area of woodland, as well as existing development along the settlement edge. In

addition, whilst Option 3 is the closest to grade I registered park and garden 'Holkham Hall', which is located in the southern part of the neighbourhood area, it is still 1.2km away and therefore unlikely to significantly impact its setting.

- 6.22 Option 4 is 70m west of Wells Conservation Area, and 110m west of grade II listed building 'Leylands'. Whilst there is open land between the site and the conservation area, it is noted that the edge of the conservation area contains relatively new builds, which provide a degree of screening between the site and the listed building. In this respect, development at this location is unlikely to impact the setting of the listed building. Finally, Option 1 is both the smallest site and the furthest from any designated heritage assets.
- 6.23 In light of the above, Option 1 is ranked first, as it is unlikely to impact the setting of any designated heritage assets in the neighbourhood area. Options 2, 3 and 4 are ranked joint second, as they are all associated with heritage constraints. In terms of significant effects, **uncertainty** is noted under Options 2, 3 and 4. However, it is recognised that the impact of all four options on the historic environment will be dependent on the design and layout of the site, which is uncertain at this stage.

Land, soil, and water resources

- 6.24 In terms of Agricultural Land Classification (ALC), all four options are underlain by Grade 3 (Good to Moderate) agricultural land. However, in the absence of a detailed assessment at this location, it is currently not possible to determine whether this land is Grade 3a (i.e., higher quality) or Grade 3b (poorer quality). In terms of Best and Most Versatile (BMV), Options 1 and 4 have a high likelihood of being underlain by BMV land (>60% area), whilst Options 2 and 3 have a moderate likelihood of being underlain by BMV land (20-60% area).
- 6.25 In terms of water resources, the neighbourhood area falls within the Norfolk North Coast Water Resource Zone (WRZ), which is supplied from groundwater abstractions in the Norfolk Chalk aquifer. According to Anglian Water's Water Resource Management Plan (WRMP), this WRZ is in balance. Nevertheless, all four options fall within the Anglian Chalk Nitrate Vulnerable Zone (NVZ) for groundwater. This means that the land is at risk from agricultural nitrate pollution (approximately 55% of land in England is covered by an NVZ).
- 6.26 The neighbourhood area lies within the North Norfolk Operational Catchment. Whilst the southern part of the district falls within the catchment of the Stiffkey Water Body, none of the options fall within a catchment for a waterbody. In this respect, development under all four options is unlikely to have any impact on the ecological status of waterbodies within or within proximity to the neighbourhood area.
- 6.27 It is noted that Option 4 is located within 200m of a Sewage Treatment Works (STW); however, it is currently unclear whether this would constrain development at all, and therefore further investigation is required.
- 6.28 In light of the above, Options 2 and 3 are ranked joint first, whilst Options 1 and 4 are ranked joint third, based on their BMV status. Despite the potential loss of BMV land as a result of development under all four options, no significant effects are predicted given the rural nature of the neighbourhood area, meaning that the loss of BMV land is largely unavoidable. Whilst the proximity of Option

4 to the STW is recognised, this has not been considered in the option's ranking at this stage due to the need for further investigation.

Landscape

- 6.29 The entire neighbourhood area falls within the Norfolk Coast Area of Outstanding Natural Beauty (AONB), whilst the northern part of the neighbourhood area falls within the North Norfolk Heritage Coast. However, none of the options fall within the latter designation.
- 6.30 All four options comprise greenfield land and will therefore result in the loss of this resource. However, it is noted that brownfield land is limited in the neighbourhood area, and therefore this is largely unavoidable.
- 6.31 In terms of topography, Options 1 and 3 are at a slightly higher elevation than Options 2 and 4. Notably, Option 1 is the smallest site, whereas Option 3 is the largest site and therefore has greater potential to impact the local landscape. Nevertheless, it is noted that Option 3 is relatively well screened from the existing built-up area of Wells-next-the-Sea by woodland. In this respect, the impact of the site on the setting of the town will be less severe.
- 6.32 Whilst all four options border the existing settlement edge, Options 1 and 4 could be considered the most contained sites as they are enclosed by Holkham Road to the north and Mill Road to the south. Whilst Option 2 borders Two Furlong Hill to the east, it extends into the open countryside to the west. However, it is recognised that the railway embankment (which is partly treelined) forms the southwestern boundary of the site and provides a degree of containment. Similarly, whilst Option 3 borders existing development and Warham Road to the north, it extends into the open countryside to the south. Nevertheless, it is recognised that development will not cover the whole site; rather, it will be focused at the settlement edge, in the northern part of the site, and along the road that runs through the centre of the site.
- 6.33 Overall, Option 4 is ranked first, due to its position close to the existing built-up area of Wells-next-the-Sea and relatively low elevation. Options 1 and 2 are ranked joint second; whilst Option 1 is the smallest site, it is positioned at a higher elevation, and whilst Option 2 is contained to some degree by the railway embankment, it is still less well contained than Option 4. Finally, Option 3 is ranked fourth due to its size and relatively high elevation, with potential to overlook nearby dwellings. Nevertheless, no significant effects are predicted as development will not cover the whole site. Whilst development under all four options will impact the setting and significance of the Norfolk Coast AONB to varying degrees, it is recognised that this is unavoidable given that the designation covers the entire neighbourhood area. In addition, development will likely come forward with or without the neighbourhood area, and the WNP offers the opportunity to steer development to locations that are least likely to negatively impact the AONB.

Transportation and movement

- 6.34 All options are considered likely to require infrastructure improvements to accommodate highways access and ensure safe pedestrian access. Proposals under all four options will therefore need to be discussed further with the Highways Authority.

- 6.35 Congestion in the summer holidays is a particular problem in the neighbourhood area due insufficient road infrastructure and car parks. Whilst all options are likely to lead to an increase in the number of private cars on the local road network, Option 4, which delivers the largest number of new homes, is likely to lead to the greatest increase in private cars. However, it is recognised that this site also has the greatest potential to deliver associated new infrastructure due to economies of scale.
- 6.36 All options are considered to perform similarly in terms of their potential to support sustainable access to local services and facilities. This is because growth under all four options would offer a broadly similar potential to walk to the limited range of services and facilities in Wells-next-the-Sea. Nevertheless, Options 2 and 3 are closest to Alderman Peel School, and Option 3 is the closest to Wells-next-the-Sea Primary and Nursery School.
- 6.37 With regard to the active travel and public transport networks, Option 3 intersects with a Public Right of Way (PRoW) and is adjacent to a National Cycle Network route. It is also in close proximity to the Wells station of the Wells and Walsingham Light Railway. However, it is noted that the Highway Authority has raised concerns over Option 3 with regards to highway safety, largely linked to the A149. This includes concerns over whether suitable footpaths could be delivered from the site to the town centre and nearby schools. Meanwhile, Option 2 is in proximity to a PRoW and adjacent to the former railway line, which is proposed to be protected through the WNP for future use. Bus stops in the neighbourhood area – which are found in the existing built-up area along Mill Road, Station Road, Standard Road, Burnt Street, and Freeman Street – can be reached on foot in under 10 minutes from all four options.
- 6.38 Overall, whilst all four options perform similarly, Options 1 and 2 are considered to perform slightly better than Options 3 and 4 and are therefore ranked joint first. Options 3 and 4 are ranked joint third; Option 3 is linked to highway safety concerns, whilst Option 4 is likely to lead to the greatest increase in cars on local roads as it delivers the highest number of new homes.. However, it is still recognised that congestion in the neighbourhood area is largely linked to the tourism industry. Due to highway safety concerns surrounding Option 3, uncertainty is noted under this option.

7. Developing the preferred approach

7.1 The WNP Working Party provide the following reasoning for continuing with the preferred approach (Option 2):

“Community consultation undertaken as part of the development of the Neighbourhood Plan revealed a very strong view that any new housing development should be aimed at local people who cannot afford to buy in the town. This was coupled with a strongly expressed concern that new housing may just become second homes or holiday lets. Evidence of the problems being experienced by local people in the housing market was reflected in the findings of the Residents Survey carried out as part of the Housing Needs Assessment undertaken by Urban Vision and evidence of the continuing increase of second homes and holiday lets was provided by North Norfolk District Council (Council Tax) supplemented by the Working Party’s own survey work.

The Working Party acknowledged that in order to deliver a better balance of housing in the town, there would be a need to do two things. Firstly to increase the delivery of affordable housing in the town available for local people, and secondly to somehow ensure that new open market housing would be within the economic reach of local people and not lost to second homes or holiday lets. Wells-next-the-Sea is a parish that has consistently high house prices but low wages. This led to the emphasis of the ‘Call for Sites’ (CFS) to be primarily focussed on delivering ‘affordable housing’ for local people. The policy ideas consultation event sought feedback from the public on the 4 sites submitted through the CFS process and each site was also independently assessed in the AECOM Site Options Assessment (which is a supporting document to the Neighbourhood Plan). The Site Options Assessment identified constraints associated with all sites. However, it was recognised that some of these may be possible to be overcome.

The challenge was to find a site that would deliver affordable housing of the scale, size and type that would be acceptable to the community and without adverse impacts upon landscape and nature conservation interests. The Working Party were also conscious that the emerging Local Plan already contains allocations for 70 new dwellings which would deliver open market housing (with some affordable) and were clear that in order for additional development in the town above that figure to be considered acceptable by the community, the emphasis would very much need to be on affordable housing for local people.

With the exception of one site (CFS2), proposals for the sites put forward included a mix of open market and affordable housing. The Working Party recognised that the provision of further open market housing (if unrestricted) could lead to further second homes/holiday lets and that this may further exacerbate the current problems in the local housing market, to the disadvantage of local people. Site CFS2 (Option 2) was considered to be the only site that could provide an opportunity for Community Led Housing (100% affordable housing options) and therefore the only site that would make any real difference to the delivery of affordable housing and the balance of the local housing market.

Taking the above into account, including the Site Options Assessment, the Housing Needs Assessment and the feedback from the community, the Neighbourhood Plan proposes to specifically identify an area of land for a specific Community Led Housing Development which would provide affordable housing for local people.

The preferred site to provide this form of housing is a portion of Site CFS2. The reasons for the preferred site are:

- The site is well related to the current settlement pattern of the town. The site is not subject to nature conservation designations.*
- The site can be developed to provide good pedestrian and cycle links with the rest of the town and the town centre.*
- The site would allow for 100 per cent affordable housing, as it is in public ownership and therefore more likely to be a viable site for this form of development.*
- The position of the site in the south-eastern corner of the wider triangle site allows for a design and layout that would provide better assimilation into the wider landscape.*
- The majority of the wider site will remain open and in current use as allotment and horse paddock.*
- Homes for Wells (a Community Land Trust) have indicated an interest in engaging with the Town Council in the development of affordable housing on the site.*
- Development on this site would be in the form of a Community Led Housing development aimed at providing affordable housing for those people with a local connection to Wells.”*

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

8.1 The aim of this section of the Environmental Report is to present appraisal findings and recommendations in relation to the current 'submission' version of the WNP. This section presents:

- An appraisal of the current version of the WNP under the seven SEA theme headings (Chapter 9).
- Consideration of potential cumulative effects (Chapter 9); and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making (Chapter 10).

8.2 This introductory chapter outlines the draft plan policies and the methodology for the appraisal.

Draft plan policies

8.3 The WNP puts forward 19 policies to guide development in the neighbourhood area, as identified in Table 8.1.

Table 8.1: WNP policies

Reference	Policy Name
WNS0	Sustainable Development and Protected Nature Conservation Sites
WNS1	Community Led Housing
WNS2	The Scale and Location of New Housing (Allocation WELLS1)
WNS3	Housing Mix
WNS4	Principal Residence
WNS5	Infill Development and Extensions
WNS6	High Quality Design
WNS7	Redevelopment Opportunities
WNS8	Retail and Town Centre
WNS9	Visitor Parking
WNS10	Opportunities for Sustainable Transport
WNS11	Protecting the Historic Environment
WNS12	Non-Designated Heritage Assets
WNS13	Local Green Spaces
WNS14	Important Views
WNS15	Sea Level Rise and Flood Risk
WNS16	Pollution
WNS17	Wells Beach
WNS18	Wells Harbour

Methodology

- 8.4 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.6 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Appraisal of the draft plan

- 9.1 This chapter presents the appraisal of the submission version WNP under the seven SEA themes established through scoping. Consideration is also given to cumulative effects.

Biodiversity

- 9.2 The biodiversity value of habitats and species in the Neighbourhood Area is internationally recognised, making the area highly sensitive to new development. All new development will be subject to the provisions of proposed Policy WNS0 which is dedicated to mitigating the impacts of development on protected nature conservation sites. The supporting Habitats Regulations Assessment (HRA) has informed this policy and the stipulations for new development, which, being in place, the HRA concludes no adverse effects on the integrity of any European designated sites.
- 9.3 The proposed allocation site, employment redevelopment opportunity sites, and suggested new car parking space all fall within an Impact Risk Zone (IRZ) associated with nearby Sites of Special Scientific Interest (SSSIs). Consultation with Natural England to date on the draft plan has not raised any significant objections, likely given the policy mitigation provided. Deciduous woodland Priority Habitat also adjoins the housing site allocation, and the site allocation policy (Policy WNS2) identifies that this is to be retained in development. The connecting area in the south of the site would benefit from being the target of biodiversity net gains on site and it is recommended that the site allocation policy is updated to suggest this.
- 9.4 Measures for biodiversity and green infrastructure in new development have also been outlined by the proposed design guide supporting the WNP. Additionally, the WNP proposes to designate a list of Local Green Spaces which will provide long term protection for the biodiversity values associated with these sites (including allotments and cemeteries).
- 9.5 Considering the mitigation provided by the WNP, **residual broadly neutral effects** are concluded as most likely overall, i.e., no significant deviation from the baseline is anticipated.

Climate change and flood risk

- 9.6 With regards to flood risk, the neighbourhood area is subject to the risks associated with sea level rise and coastal erosion, and it is recognised that the eastern extent of the area is not protected by flood barriers. With regards to the proposed housing development site, it is not considered at risk from fluvial or surface water flooding. The Marylands redevelopment opportunity site and the suggested new car parking site both fall within an area at low risk, however, as redevelopment sites, there may be opportunities to improve drainage on site and improve flood defences. Similarly, the application of sustainable drainage systems in new development, as required under Policy WNS15, should ensure no significant effects arise in relation to surface water flood risk.
- 9.7 With regards to climate resilience, the following observations are made:

- There are design code and policy stipulations that seek to improve the sustainability performance of new development, including in relation to water quality, pollution, design standards, flood risk, and ecological and natural resilience.
 - The proposed new housing development site is relatively small-scale (45 new homes) within walking distance of the town centre and seeks to provide people with local connections (including those who work locally) a chance to reside in the same area (thus potentially reducing in-commuting).
 - The plan seeks to utilise any available brownfield opportunities; and
 - The plan seeks to safeguard potential future rail corridor connections that could enhance sustainable access.
- 9.8 These points are considered likely benefits arising in implementation of the plan. Whilst it is recognised that there is no strategic requirement to allocate additional land for housing development, the plan prioritises local housing need as an acute issue within scope to address and proposes a relatively accessible site to meet these needs. On this basis, no significant deviations from the baseline are anticipated, and **minor positive effects** are considered most likely.

Community wellbeing

- 9.9 Residents at Wells-next-the-Sea benefit from access to the natural coast in a town with a moderate provision of services and facilities, and a local economy boosted by tourism. The main settlement area is considered less deprived than the surrounding areas, reflecting the settlement offer, however, there are limited sustainable transport connections.
- 9.10 Whilst wellbeing benefits are associated with the area, there are acute housing issues affecting residents, namely due to high house prices and a significantly high proportion of second homes compounding the high value of homes. This has consequences for the primary residents and employers in the neighbourhood area who are faced with a declining population out of season, and restricted access to the housing market. Key workers are priced out of the area and in the context of an ageing population there is limited opportunity to downsize and increasing levels of social isolation.
- 9.11 Recognising and addressing these issues is a core objective for the WNP, demonstrated by its pursuit of additional housing development land and a 100% affordable housing scheme, targeting those with a local connection. Additionally, the policy framework seeks to restrict second homes through a targeted principal residence policy for all new development (outside of the strategic local plan allocation sites). This will allow the principal resident population to grow over time and provide opportunities for key workers to reside locally.
- 9.12 The allocation site itself is suitably connected to the main settlement area and future residents will benefit from adjacent open land and allotment spaces. Furthermore, the WNP has identified detailed design codes to guide future development and ensure high-quality and connected areas that are inclusive and not intrusive.

- 9.13 Additional positive effects are considered likely from the wider policy framework which identifies brownfield redevelopment opportunity sites for further employment development in the town and a potential new area for visitor parking, supports town centre and retail improvements, safeguards potential future rail connection corridors, and protects non-designated heritage assets, important views, and identified local green spaces. Furthermore, the maritime character and nature of the area is supported with policies seeking to restrict the sprawl of the existing holiday park at Wells Beach, and to improve the role and function of Wells Harbour.
- 9.14 Considering these complementary elements and objectives of the WNP to the existing development policy framework, **significant positive effects** are concluded as likely.

Historic environment

- 9.15 A significant proportion of the main settlement area holds heritage value and is designated for such values. This includes an extensive conservation area containing some 180 Listed Buildings. In addition, the designated Heritage Coast intersects the settlement area in the east. There are WNP proposals that ultimately have the potential to affect the setting and significance of designated (and non-designated) assets which include the allocation of housing land (for 45 new homes), the identification of brownfield redevelopment opportunities for employment purposes, and the identification of a potential new site for seasonal visitor parking.
- 9.16 Taking each in turn and beginning with the housing allocation site, it is noted that the site lies in the west of the settlement area outside of the conservation area. With existing development between the site and the conservation area, no direct impacts are considered likely, though there may be additional traffic pressures within the designated area resulting from new development. The site allocation policy (WNS2) requires footpath and cycle connections with the town centre, which is within walking distance. Indirect impacts are therefore not considered likely to be significant. One Listed Building (Grade II West Cottage) lies adjacent to the site in the southeast corner; however, this is heavily screened by existing trees which the site allocation policy stipulates must be retained in development at the site.
- 9.17 With regards to the identified brownfield redevelopment opportunity sites, it is noted that the Maryland site lies just outside of the conservation area, off Polka Road. The site is brick warehousing that does not visually contribute to the heritage setting. Redevelopment of the site, guided by WNP policies including the proposed design guide, has good potential to lead to positive effects in relation to heritage settings. The site off Freeman Street is an existing car parking area that lies entirely within the conservation area. Linking to the suggested new car parking site, encouraging new employment development at this location could improve the setting and move car parking to a more appropriate location outside of the conservation area, to encourage more pedestrian traffic and less vehicular traffic within the conservation area. Again, positive effects are considered likely as a result.
- 9.18 The wider policy framework of the WNP also contributes additional heritage protections to an identified list of non-designated assets and supportive protective policy directions for designated assets, including the conservation

area, signage and shopfronts, and open spaces between historic buildings. Furthermore, the policy framework seeks to restrict the sprawl of the holiday park at Beach Road and in doing so will offer protection for the setting of the Heritage Coast. This is alongside the aforementioned design guide, which ultimately seeks to protect and enhance the character of the neighbourhood area.

- 9.19 Considering these points, the policy mitigation provided is considered likely to ensure that no significant negative effects arise, and the additional policy protections alongside measures to improve the setting of, and uses within, the conservation area are considered likely to lead to **minor long-term positive effects**.

Land, soil, and water resources

- 9.20 In terms of ALC (Agricultural Land Classification), the neighbourhood area is underlain by Grade 3 (Good to Moderate) agricultural land. However, in the absence of a detailed assessment at this location, it is currently not possible to determine whether this land is Grade 3a (i.e., higher quality) or Grade 3b (poorer quality). In terms of BMV, the neighbourhood area has a high (>60% area) to moderate (20-60% area) likelihood of being underlain by BMV land.
- 9.21 In terms of water resources, the neighbourhood area falls within the Norfolk North Coast WRZ, which is supplied from groundwater abstractions in the Norfolk Chalk aquifer. According to Anglian Water's Water Resource Management Plan (WRMP), this WRZ is in balance. Nevertheless, much of the neighbourhood area falls within the Anglian Chalk NVZ for groundwater. This means that the land is at risk from agricultural nitrate pollution (approximately 55% of land in England is covered by an NVZ).
- 9.22 Site WELLS1 (Two Furlong Hill), allocated through Policy WNS2 of the draft WNP, comprises greenfield land, and will therefore result in the loss of this resource. It may also lead to the loss of productive agricultural land, as the site has a moderate (20-60% area) likelihood of being underlain by BMV land. The site also falls within the Anglian Chalk NVZ. However, it is recognised that development of the site is unlikely to significantly impact this designation given its small scale. The policy also outlines that the allocation will be accompanied by the submission, approval, and implementation of a Surface Water Management Plan to ensure that greenfield runoff rates are not increased.
- 9.23 In terms of the wider policy framework, Policy WNS0 (Sustainable development and protected nature conservation sites) of the draft WNP outlines the importance of incorporating Sustainable Drainage Systems (SuDS) into new development for the sake of water quality. This is because SuDs can reduce runoff rates and discharge to the ground or enable the detention/ retention of runoff to allow for sufficient attenuation. Notably, attenuation can improve water quality by filtering pollutants. Strengthening this, Policy WNS6 (High quality design) outlines that parking areas and driveways should be designed to minimise water runoff through the use of permeable paving.
- 9.24 Overall, **minor negative effects** are considered likely regarding this SEA topic. This is because the site allocation will lead to the loss of greenfield land, which also has a moderate (20-60% area) likelihood of being underlain by BMV land. Nevertheless, it is recognised that the rural nature of the neighbourhood area

means that brownfield land is not widely available. In terms of water resources, no significant constraints are identified.

Landscape

- 9.25 The whole of the neighbourhood area is considered a nationally important landscape, designated as part of the Norfolk Coast Area of Outstanding Natural Beauty (AONB). Any development, therefore, particularly major development, has the potential for landscape impacts. The WNP is proposing small-scale development, and the proposals within the plan are confined to the settlement area and land adjacent to it.
- 9.26 The proposed housing allocation site (Policy WNS2) is greenfield land at the settlement edge, within an area identified in the emerging Local Plan as an 'Open Land Area'. The allocation site reflects a reduced size land parcel (than that that was submitted through the call for sites) at the edge of the open land area (maintaining this designation to a large degree) and avoiding any loss of the existing Local Green Space (Mill Road allotments).
- 9.27 The WNP further proposes two brownfield redevelopment opportunity sites for further employment development in the town, the development of which has good potential to improve on townscape and public realm settings, including by reducing vehicular presence within the town centre.
- 9.28 Policy WNS17 seeks to restrict the sprawl of the holiday park along the beach, which will also provide long-term protection for the setting of the designated Heritage Coast which form valuable aspects of the landscape setting in this area. In addition, Policy WNS18 seeks positive reinforcement and development of the maritime character of Wells Harbour.
- 9.29 Of note, the WNP has developed a supporting design code for new development, which ultimately seeks to retain and enhance the valued landscape and townscape features which contribute to the character of the area. Wider policy measures also further promote high-quality, integrated, and sustainable future development of the town, including provisions to provide long-term protection to identified Local Green Spaces and identified important views.
- 9.30 Considering these points, **both minor negative and minor positive effects** are concluded as most likely in relation to the landscape SEA theme. No significant impacts are considered likely with small-scale development being proposed in the AONB.

Transportation and movement

- 9.31 The neighbourhood area is relatively poorly served by public transport. Whilst Norwich can be reached via King's Lynn, Fakenham, and Cromer, which are all accessible to the neighbourhood area via bus, the journey time is over 2 hours as the bus services do not connect well with each other or the train network. As this journey is only 1 hour via car, local people are more likely to drive, and are therefore unlikely to access employment opportunities in Norwich via public transport unless they do not have access to a private car. On a more local scale, a light railway provides a service between Wells and Walsingham.

- 9.32 The A149 passes through the centre of Wells-next-the-Sea in the east-west direction. The B1105 joins this road in the town centre from the south. Both roads connect the town to the surrounding strategic road network, providing access to nearby towns and villages. There are five car parks in Wells-next-the-Sea providing car parking for several hundred cars, with additional spaces for visiting coaches. There is also occasional overflow parking on Beach Road. Despite this, parking becomes a key issue in the summer months as visitors flock to the neighbourhood area to access the coast.
- 9.33 The draft WNP addresses several of these issues via its policy framework. To begin with, Policy WNS9 (Visitor parking) supports proposals for suitably located temporary/ seasonal car parking, which will help alleviate the town's parking problem during the summer months. In addition, Policy WNS10 (Opportunities for sustainable transport) protects the former Wells to Walsingham railway track bed and other railway land from development so that, in the future, the existing service can potentially be expanded. Finally, Policy WNS6 (High quality design) outlines that new development should connect to the wider area and the existing PRoW network and prioritises pedestrian and cycling movement. It also parking should include cycle parking and storage.
- 9.34 With a focus on the site allocation (Policy WNS2), Site WELLS1 (Two Furlong Hill) will be delivered alongside safe and convenient access from Two Furlong Hill, with a footway along the site frontage linking to the existing footway to the south. A crossing will also be provided on the A149, so that new residents can safely and easily access the town centre by foot. Notably, pedestrian and cycle access is a focus of this site allocation.
- 9.35 Overall, increases in vehicle use on local roads are an inevitable evolution of the baseline. Nevertheless, the site allocation made by the draft WNP prioritises pedestrian and cycle movement, and is well located to local services and facilities, as well as several bus stops in the town centre. This is strengthened via the wider policy framework, which seeks to improve active travel and public transport in the neighbourhood area, as well as tackle to existing parking problem that the town faces in the summer months. In light of this, **significant positive effects** are considered likely under this SEA topic.

Cumulative effects

- 9.36 The HRA supporting the WNP has identified no likely adverse in-combination effects. Cumulatively the policy stipulations of the WNP in delivering additional affordable housing will contribute to providing local housing for principal residence and people with local connections, supporting key workers such as teachers, Lifeboat Crew, and hospitality workers and these economic sectors that benefit the County. The safeguarding of potential future rail corridors also provides opportunities for County transport plans to unlock more strategic transport improvements.

10. Conclusions and recommendations

- 10.1 Overall, despite the significant constraints associated with the neighbourhood area, no significant negative effects are considered likely in implementation of the WNP. Minor negative effects are concluded as likely in relation to the landscape, and land, soil, and water resources SEA themes, predominantly given the loss of greenfield land at the settlement edge. As no major development is being proposed in the AONB and policy mitigation is provided, significant landscape impacts are considered likely to be avoided.
- 10.2 This is contrasted with predicted likely significant positive effects in relation to both the community wellbeing and transportation and movement SEA themes. This reflects the core plan efforts to deliver a 100% affordable housing scheme and rebalance the housing stock, with greater restrictions on second homes and more opportunities for those with local connections, including key workers in the area. Additional efforts to safeguard rail corridors that could enhance the future sustainability performance of the area are noted in relation to transportation and movement.
- 10.3 Minor positive effects are also concluded in relation to the SEA theme of landscape, as well as the themes of climate change and flood risk, and the historic environment. Positive landscape effects are considered likely due to the prioritisation of brownfield redevelopment opportunities (and opportunities to improve the immediate townscape), and the identification of detailed design guidance. The support for high-quality development and identification of relatively accessible development sites within walking distance of the town centre, alongside the safeguarding of potential future rail connections that could significantly improve the settlement's sustainability performance are considered likely to contribute to climate resilience and deliver minor benefits in this respect.
- 10.4 Broadly neutral residual effects are concluded as most likely in relation to biodiversity, reflecting the stringent policy mitigation measures proposed developed with the supporting HRA.
- 10.5 One recommendation is made to update the site allocation policy suggesting that development targets biodiversity net gains on site to the south of the site and the area connecting with the deciduous woodland Priority Habitat there.

Part 3: What are the next steps?

11. Next steps

11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

11.2 Following submission, the plan and supporting evidence (including this SEA) will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

11.3 If the examination leads to a favourable outcome, the plan will then be subject to a referendum, organised by North Norfolk District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for North Norfolk, covering the defined neighbourhood area.

Monitoring

11.4 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

11.5 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by North Norfolk District Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the WNP that would warrant more stringent monitoring over and above that already undertaken by the Council.

Appendix A – Regulatory requirements

As discussed in **Chapter 1**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the SEA Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA-1** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA-2** explains this interpretation. **Table AA-3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA-1 Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁹
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making /SEA process.

⁹ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Table AA.2 Questions answered by the Environmental Report, in-line with an interpretation of regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table AA.3 ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are, and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’). Key messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). Also, Appendix B presents key messages from the context review. With regards to explaining “how...considerations have been taken into account”, Chapter 7 explains the Working Party’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a ‘stand-out’ plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Parish Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives assessment).

9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10.A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>At the current time, this Environmental Report is published alongside the submission version Wells-next-the-Sea Neighbourhood Plan, with a view to informing Regulation 16 consultation.</p>
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The SA must be considered, alongside consultation responses, when finalising the plan.

<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Working Party and have informed/ will continue to inform plan finalisation.</p>
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Appendix B - Scoping information

Linked to Chapter 3 of the Environmental Report, this appendix provides further scoping information.

Consultation responses

Statutory authorities were consulted in February 2023. Responses were received from Natural England and Historic England and are documented below. No response was received from the Environment Agency.

Consultation response	Considerations
<p>Natural England Julian Clarke, Consultations, Crewe Business Park, Cheshire</p> <hr/> <p>Wells Next The Sea SEA Scoping Consultation Thank you for your consultation on the above dated 28 February 2023. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England has no specific comments to make on this neighbourhood plan SEA scoping.</p>	<p>Thank you for your response, we note no specific comments are made but opportunities for the plan process are identified.</p>
<p>Historic England Edward James, Historic Places Advisor, East of England</p> <hr/> <p>Ref: Wells next the Sea SEA Scoping</p> <p>Thank you for your email requesting a scoping opinion for the Wells-next-the-Sea Neighbourhood Plan SEA.</p> <p>We would refer you to the advice in <i>Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment</i>, which can be found here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/. This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.</p> <p>We would also refer you to <i>Historic England Advice Note 3: Site Allocations and Local Plans</i>. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process and is therefore a more appropriate methodology to employ in this context.</p> <p>We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently</p>	<p>Thank you for your response, we note no specific comments are made and the advice notes are included within the scoping information.</p>

Consultation response

Considerations

to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

If you have any further questions, please contact the Partnerships Team who can be reached on 01223 582749.

Key issues

The following key issues for each of the SEA themes that form the SEA framework have been established through scoping, noting that in the absence of significant issues the SEA theme of air quality has been scoped out of the appraisal framework:

Biodiversity

Existing ecological connections of international and national significance are predominantly found in the north of the neighbourhood area towards the coast. There are also connections which take up a large proportion of the east of the neighbourhood area. There will be a need to consider avoidance and mitigation for development in this part of the neighbourhood area. However, there is also the potential to focus biodiversity gains in this area too, as a recognised enhancement zone. Consideration will be given to the findings of the Habitats Regulations Assessment (HRA) at a later stage of plan making.

Climate change and flood risk

CO₂ emissions associated with transport remain high in North Norfolk, highlighting the importance of the delivery of sustainable transport infrastructure. While the WNP is limited in the extent to which it can deliver transport improvements; it can utilise opportunities to strengthen active travel routes, support active travel uptake and increase self-containment.

As with much of the country, extreme heat events are likely to occur more frequently in the future. In addition to this, drought is likely to become an increasing issue in summer, whilst surface water/ groundwater flooding is likely to increase during winter

months. In this respect, climate change resilience should form an integral part of the WNP policy framework.

The neighbourhood area is a complex location, whereby the north is at high risk from tidal and coastal flooding. As such, there is a need to consider flood risk, avoiding vulnerable development in areas of high fluvial flood risk, and managing, and where possible, improving drainage rates. Wells Harbour Commissioners are currently working with marine advisors Royal Haskoning and will be developing a Flood Risk Management Plan, which should be used to inform the Neighbourhood Plan if possible.

Community wellbeing

Wells is extremely popular with holiday makers and second homeowners. As part of work to support early iterations of the Local Plan, North Norfolk District Council produced a number of Settlement Profiles in 2018, which identified the total number of dwellings in Wells-next-the-Sea as 1,557 and the number of second homes as 383. This equates to 21.2% of total dwellings being used as second homes. This compares to the proportion of second homes in North Norfolk district as a whole for the same period as 7.8 per cent.

The high proportion of second home ownership makes a lack of affordable housing one of the key issues in the neighbourhood area, particularly in the north. For example, the northern half of the neighbourhood area falls within the most deprived category (1-2nd decile) in terms of barriers to housing and services, while the more rural south of the town is a stark comparison to this in the least deprived category (9-10th decile).

Deprivation, access to education, skills and training and living environment domain also follow the same pattern of having lower ratings in the north as compared with the south. For example, in the IMD the north is ranked in the 3-4th decile whereas the south is in the 5-6th decile. Similarly, for both access to education, skills and training and the living environment domain the north is ranked in the most deprived category (1-2nd decile) whereas the south fares slightly better in the next category up (3-4th decile).

Historic environment

The dense concentration of listed buildings in Wells-next-the-Sea presents a constraint to future development within the neighbourhood area. The WNP can help overcome this by ensuring that any development that comes forward during the plan period is sensitive to the historic setting of the village in terms of design and layout, particularly in relation to the Wells Conservation Area.

In addition to the Draft Wells Conservation Area Appraisal, the WNP presents an ideal opportunity to provide policy that protects the key characteristics of this area, and identifies the significance associated with different settings and non-designated assets.

Land, soil, and water resources

Stiffkey & Glaven Estuary has been in bad ecological status since 2013. Norfolk North Sea fares slightly better over the same time period, consistently achieving moderate status. Both waterbodies failed their most recent chemical assessment in 2019. However, the Environment Agency highlights that all water bodies failed for

chemical status in this timeframe and that the 2019 assessments are not comparable to previous years.

It will be important that future development within the neighbourhood area does not lead to deterioration of the Stiffkey & Glaven Estuary, which is directly linked to the North Sea (Norfolk North Water Body). The water quality of both these waterbodies is an important indicator of the overall health of the surrounding marine environment ecosystems. Keeping the water free of pollutants, contaminants, and litter all act to increase water quality.

Development in Wells has the potential to lead to the loss of productive agricultural land, although it is anticipated that much of the development will take place around the more urbanised town centre and surrounding non-agricultural land.

Landscape

It will be important that the WNP seeks to protect the local landscape, particularly the AONB and Heritage Coast in future development, including their coherence and characteristics, through an appropriate spatial strategy and suitable design and layout. It will be important that the WNP strategy is in line with the aims of the AONB Management Plan.

There was a strong preference in the consultation event report that residents would prefer the development of brownfield sites to maintain the rural character of the surrounding Wells 'rolling open farmland' classification.

Transportation and movement

Congestion in the summer holidays is a particular problem in the neighbourhood area with only a small level of road infrastructure to support a large demand in the summer months from tourists. Associated with this is the insufficient amount of car parks to support the tourism industry in the summer. Problems caused by the sheer number of visitors at peak occasions include on street parking within the town often in residents' spaces, parking on double yellow lines, narrow roads being blocked which in turn causes congestion and pollution problems and problems of overflow parking at existing car parks.

The neighbourhood area presents good opportunities for the WNP to build upon existing walking and cycling networks.

